

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

WOMEN’S LIBERATION FRONT,

Plaintiff,

v.

Case No. 1:16-cv-915-WPL-KBM

**UNITED STATES DEPARTMENT OF
JUSTICE; LORETTA E. LYNCH, in
her Official Capacity as Attorney
General of the United States; VANITA
GUPTA, in her Official Capacity as
Principal Deputy Assistant Attorney
General; UNITED STATES
DEPARTMENT OF EDUCATION;
JOHN B. KING, JR., in his Official
Capacity as United States Secretary of
Education,**

Defendants.

DEFENDANTS’ MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants United States Department of Justice, Loretta E. Lynch, Vanita Gupta, United States Department of Education, and John B. King, Jr. respectfully move the Court to dismiss Plaintiff’s Complaint. In accordance with Local Rule 7.3(a), this motion is accompanied by a brief containing a statement of points and authorities upon which Defendants rely in support of this motion. Counsel for Defendants has conferred with counsel for Plaintiff, who indicates that Plaintiff opposes this motion.

Dated: October 24, 2016

Respectfully submitted,

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

JENNIFER D. RICKETTS
Director, Federal Programs Branch

SHEILA M. LIEBER
Deputy Director, Federal Programs Branch

/s/ Benjamin L. Berwick

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2016, a copy of the foregoing Motion to Dismiss was filed electronically via the Court's ECF system, which effects service upon counsel of record.

/s/ Benjamin L. Berwick
Benjamin L. Berwick